

**REMARKS/ARGUMENTS**

Various claims are being amended as shown above. No new matter is being added by the amendment to the claims.

In the office action, claims 1-10, 12, 16-19, 25-34, 36, 40-43, 49 and 50 were rejected under 35 U.S.C. 102(e) as allegedly being unpatentable over Krohn (US 2004/0236965 A1). Applicants respectfully traverse the rejection.

Krohn is directed to a system where a client device 403 establishes an SSL (Secure Socket Layer) communication link with a server 103 based on the exchanges of "hello" messages that include information for establishing the SSL link between the client device and server. However, Krohn does not disclose the use a key value and identifier value for determining node membership in a secure group, and Krohn also does not disclose the distribution of secure information between nodes that have been determined to be in the secure group. Therefore, Krohn does not disclose various features that are recited in claim 1. Accordingly, claim 1 is patentable over Krohn

Independent claims 25, 49, and 50 are also being amended to recite features that are not disclosed by Krohn. Accordingly, claims 25, 49 and 50 are each patentable over Krohn.

Claims 2-10, 12, 16-19, 26-34, 36, and 40-43 depend from one of claims 1 and 25 and are each patentable over Krohn for at least the same reasons that claims 1 and 25 are each patentable over Krohn. Furthermore, each of the claims 2-10, 12, 16-19, 26-34, 36, and 40-43 distinguishes over Krohn by reciting additional features in combination with the features that are recited in their respective base

claim. For example, claim 3 recites "establishing an encryption key with the adjacent node" in combination with the features that are recited in claim 1, and this combination of features are not disclosed by Krohn. As another example, claim 9 substantially recites the further details on the handshaking process which is not disclosed by Krohn. Accordingly, claims 2-10, 12, 16-19, 26-34, 36, and 40-43 are each patentable over Krohn.

For the above reasons, Applicants request reconsideration and withdrawal of the rejection under 35 U.S.C. §102.

In the office action, claims 11, 13, 20, 21, 35, 37, 44, and 45 were rejected under U.S.C. 103(a) as allegedly being unpatentable over Krohn in view of Benantar, et al. (US 6,854,056). Applicants respectfully traverse the rejection.

The Examiner correctly admits in the office action that Krohn fails to disclose the following features: A method where the secure information comprises a password; A method further comprising distributing secure information to each adjacent node that is a member of the secure group, in response to an update of the secure information; A method further comprising resolving an ambiguity between a received updated secure information and currently stored secure information by selecting the secure information with a large data value; A method further comprising increasing a security of the secure group by widening the key value which is known by each node in the secure group. In an

attempt to overcome the deficiencies of Krohn, the Examiner relies on Benantar in an attempt to show various features.

Claims 11, 13, 20, 21, 35, 37, 44, and 45 depend from one of claims 1 and 25 and are each patentable over the combination of Krohn and Benantar for at least the same reasons that claims 1 and 25 are each patentable over the cited references, considered singly or in combination. Furthermore, each of the claims 11, 13, 20, 21, 35, 37, 44, and 45 distinguishes over the combination of Krohn and Benantar by reciting additional features in combination with the features recited in their respective base claim. For example, claims 20 and 44 each substantially recites resolving an ambiguity between secure information by selecting the larger data value, while Benantar does not specifically disclose the particular steps for reconciling the authentication data. Therefore, Benantar does not disclose the features that are substantially recited in claims 20 and 44. Accordingly, claims 11, 13, 20, 21, 35, 37, 44, and 45 are each patentable over the combination of Krohn and Benantar.

For the above reasons, Applicants request reconsideration and withdrawal of the rejection under 35 U.S.C. 103.

In the office action, claims 14, 15, 23, 24, 38, 39, 47, and 48 were rejected under U.S.C. 103(a) as allegedly being unpatentable over Krohn in view of Hafer (US 4,530,092). Applicants respectfully traverse the rejection.

The Examiner correctly admits in the office action that Krohn fails to disclose the following features: A method where the action of performing the handshake process comprises performing the handshake process with the adjacent node once for every fixed time amount  $T$ ; A method further comprising after detecting the presence of another node that is not in the adjacency set, attempting to handshake with that another node if a detecting node and the another node both have a handshake time remaining value of zero (0); A method further comprising allowing for rapid construction of the secure group by transmitting a burst of  $NB$  handshakes for every amount of time  $TB$ , where  $NB$  is the number of handshakes and  $TB$  is a time amount between burst of handshakes; A method further comprising preventing a single node in the secure group from attempting to handshake with numerous nodes to avoid excessive joins, by establishing membership with one adjacent node at a time, and waiting at time  $TW+TR$  between handshake attempts, where  $TW$  is a fixed configurable time amount and  $TR$  is a random amount of time that is bounded by a user-specified bound range. In an attempt to overcome the deficiencies of Krohn, the Examiner relies on Hafer in an attempt to show various features.

Claims 14, 15, 23, 24, 38, 39, 47, and 48 depend from one of claims 1 and 25 and are each patentable over the combination of Krohn and Hafer for at least the same reasons that claims 1 and 25 are each patentable over the cited references, considered singly or in combination. Furthermore, each of the claims 14, 15, 23, 24, 38, 39, 47, and 48 distinguishes over the combination of Krohn and

Hafer by reciting additional features in combination with the features recited in their respective base claim. For example, claims 24 and 48 each substantially recites the use of TW and TR variables as defined in the claims, while Hafer instead discloses the use of a general time slot value for broadcasting signals and for acknowledgements of the signals. Therefore, Hafer does not disclose the features that are substantially recited in claims 24 and 48. Accordingly, claims 14, 15, 23, 24, 38, 39, 47 and 48 are each patentable over the combination of Krohn and Hafer.

For the above reasons, Applicants request reconsideration and withdrawal of the rejection under 35 U.S.C. 103.

In the office action, claims 22 and 46 were rejected under U.S.C. 103(a) as allegedly being unpatentable over Krohn in view of Levine, et al. (US 2003/0061481). Applicants respectfully traverse the rejection.

The Examiner correctly admits in the office action that Krohn fails to disclose the following features: A method further comprising decreasing an amount of time between symmetric key regeneration (TK) to increase the security of the secure group; An apparatus where the node is configured to decrease an amount of time between symmetric key regeneration (TK) to increase the security of the secure group. In an attempt to overcome the deficiencies of Krohn, the Examiner relies on Levine in an attempt to show various features.

Claims 22 and 46 depend from one of claims 1 and 25 and are each patentable over the combination of Krohn and Levine for at least the same reasons that claims 1 and 25 are patentable over the cited references, considered singly or in combination. Furthermore, each of the claims 22 and 46 distinguishes over the combination of Krohn and Levine by reciting additional features in combination with the features recited in their respective base claim. For example, claims 22 and 46 each substantially recites decreasing an amount of time between symmetric key regeneration (TK), while Levine discloses symmetric key generation but does not disclose decreasing any time between the key generation. Therefore, Levine does not disclose the features that are substantially recited in claims 22 and 46. Accordingly, claims 22 and 46 are each patentable over the combination of Krohn and Levine.

For the above reasons, Applicants request reconsideration and withdrawal of the rejection under 35 U.S.C. 103.

New claims 51-58 are being added, and each of the new claims recites features that are not disclosed and are not suggested in the cited references. For example, the cited references do not disclose a one way function that is applied to a key value (as recited in the base claims) during a handshaking process, as recited in the claims. Accordingly, claims 51-58 are patentable over the cited references.

Applicants respectfully request allowance of all pending claims.

CONTACT INFORMATION

If the Examiner has any questions or needs any additional information, the Examiner is invited to telephone the undersigned attorney at (805) 681-5078.

Date: July 25, 2008


Respectfully submitted,  
Michael Roeder, et al.



By: Arnold M. de Guzman  
Attorney for Applicant(s)  
Reg. No. 39,955  
805.681.5078  
805.681.5076 (FAX)

Please send correspondence to:

**IP Administration**  
**Legal Department, M/S 35**  
**HEWLETT-PACKARD COMPANY**  
**P.O. Box 272400**  
**Fort Collins, CO 80527-2400**

| CERTIFICATE OF MAILING   |   |        |               |
|--|---|--------|---------------|
| I hereby certify that this correspondence, including the enclosures identified herein, is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date shown below. If the Express Mail Mailing Number is filled in below, then this correspondence is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service pursuant to 37 C.F.R. 1.10. |   |        |               |
| Signature:   |  |        |               |
| Typed or Printed Name:   | Arnold M. de Guzman, Reg. No. 39,955  | Dated: | July 25, 2008 |
| Express Mail Mailing Number (optional):  |   |        |               |